

0045

United States
Department of
Agriculture

Forest
Service

Manti-LaSal
National Forest

599 West Price River Dr.
Price, Utah 84501

Orig: mine file
cc: S. Linn

Reply to: 2820

Date: December 19, 1988

Lowell Braxton
State of Utah Natural Resources
Division of Oil, Gas and Mining
355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

RECEIVED
DEC 21 1988

DIVISION OF
OIL, GAS & MINING

Dear Lowell:

RE: Five-Year Permit Renewal and New Lease Responses, Genwal Coal Company,
Crandall Canyon Mine, ACT/015/032, Folder #2, Emery County, Utah

We have reviewed Genwal Coal Company's November 25, 1988, response; your letter dated November 29, 1988, regarding the reclamation seed mix; and Dave Darby's letter dated October 9, 1988, regarding subsidence/slope stability. We have made the following determination regarding the above letters and our remaining comments (letters dated June 1, 1988, and October 17, 1988) on the five-year renewal and new lease addition. Our comments are divided into two sections. The first set of comments is for the five-year renewal of the existing permit and the second set of comments is for the addition of Federal Coal Lease U-54762 into the permit area.

Five-Year Renewal

1. Reclamation Seed Mix, Comment #2-FS 10/17/88 Ltr., Comments #12-FS 6/1/88 Ltr.

We consent to the seed mix developed by Bob Thompson and Lynn Kunzler. A copy is attached for clarification.

2. Temporary Sediment Pond Sludge Storage at the West End of the Coal Stockpile Area, Comment 8-FS 6/1/88 Ltr.

Genwal has proposed to construct a coal berm around the sludge pile and to construct straw bales or sediment fences around the pile if excess drainage becomes a problem. Considering the low density of the coal and the permeability of the coal and sediment fences and straw bales, we do not believe that the sludge and water will be adequately contained. The plan needs to be revised to provide an adequate mechanical barrier to contain the sludge. If the barrier is permeable and will not contain the water for evaporation, drainage to the ditch between the coal processing area and Forest development road must be provided such that the processing area and entrance do not become soft and rutted.

3. The remaining Forest Service comments have been adequately addressed.

Addition of Federal Coal Lease U-54762 to the Permit Area

4. Subsidence/Slope Stability, Comment 6-FS 10/17/88 Ltr., Comments 13, 22, 35 and 36-FS 6/1/88 Ltr.

We agree with the conclusion and requirement outlined in Dave Darby's letter dated October 9, 1988. The requirement limits Genwal to developmental mining only in areas with less than 500 feet of overburden until a reasonable professional study concludes that no adverse impacts will occur to resources. Recovery mining will still be allowed with overburden greater than 500 feet. Genwal has responded that second mining under similar slopes at the Beaver Creek Huntington Canyon #4 Mine and the Co-Op Mine has taken place without causing significant slope stability problems and have referred to a BLM letter confirming this determination. The BLM letter was not submitted with the latest response nor have we received a determination from BLM. We will consent to the mining scenario presented in Dave Darby's letter. We will not consent to recovery mining in areas where there is less than 500 feet of overburden until we receive an adequate response from BLM confirming Genwal's statement or a geotechnical study which confirms this opinion.

5. Crandall Creek-Forest Service Minimum Instream Flow Needs, Comment 24-FS 6/1/88 Ltr.

Genwal has committed (page 7-57, paragraph 2) to working with the Forest Service to calculate the minimum instream flow needs as required. In addition, Genwal has stated (page 7-74, paragraph 4) that once the instream flow needs are established, they will maintain the minimum instream flows. We feel that this is adequate and will require compliance.

The Manti-LaSal National Forest will consent to the permit renewal subject to permit stipulations that these issues be resolved or after Genwal Coal Company makes revisions which are adequate to resolve the concerns.

The Manti-LaSal National Forest will consent to the addition of Federal Coal Lease U-54762 only after receipt and review of the technical analysis and under the conditions stated in item 4 above.

If you have any questions, please contact the Forest Supervisor's Office in Price, Utah.

Sincerely,

George A. Morris
for
GEORGE A. MORRIS
Forest Supervisor

Enclosure

At Sue - have Dave get a copy of the BLM letter noted in #4. Let's see if it will satisfy USFS. If not, we should discuss having BLM draft a letter to USFS that will... This is the Wilberg cliff issue all over again.

LDS 12-21

Revised
 Recommended Seed Mix
 Genwal Coal Company
 Crandall Canyon Mine
 ACT/015/032
 November 28, 1988

Species	Rate*
GRASSES & FORBS:	Lbs/Acre
Agropyron dasystachum	
Thickspike wheatgrass	3.0
Agropyron smithii	
Western wheatgrass	3.0
Agropyron spicatum	
Bluebunch wheatgrass	2.0
Agropyron trachycaulum	
Slender wheatgrass	3.0
Bromus caranatus (marginatus)	
Mountain brome	3.0
Dactylis glomerata	
Orchard grass	0.5
Elymus cinereus	
Great Basin wildrye	2.0
Aster glaucoides	
Blueleaf aster	0.5
Linum lewisii	
Lewis flax	1.0 0.5
Melilotus officinalis	
Yellow sweetclover	1.0
Penstemon palmeri Sanquisorbia minor	0.5
Palmer penstemon Small burnet	1.0
TOTAL	<u>19.5</u> 15.0
SHRUBS:	
Symphoricarpos oreophilus	
Snowberry	2.0 1.0
Rosa woodsii	
Woods rose	1.0
Amelanchier utahensis	
Utah serviceberry	1.0
Rhus trilobata	
Squawbush	1.0
Sambucus cerulea Juniperus scopulorum	1.0 1.0
Blue elderberry Rocky mtn. red cedar	
Cercocarpus ledifolius	1.0
Curleaf mtn. mahogany	
TOTAL	<u>7.0</u> 4.0

*Rate is for Pure Live Seed (PLS) to be broadcast seeded over all disturbed area. For best results, lightly rake areas that have been seeded.

Recommended Planting Mix*
 Genwal Coal Company
 Crandall Canyon Mine
 ACT/015/032
 November 28, 1988

Species	Plants/Acre
<u>TREES:</u>	
<u>Picea englemanni pungens</u>	150
Blue Engleman spruce	
<u>Pseudotsuga menziesii</u>	150
Douglas fir	
<u>Pinus Ponderosa</u>	50
Ponderosa pine	
<u>Populus angustifolia</u>	75
Cottonwood	
<u>Populus tremuloides</u>	75
Quaking aspen	
<u>Salix myrtifolia boothii + geyeriana</u>	110 50 each = 100
Willow	<u>50</u>
Juniperus scopulorum --]	TOTAL 610 575
Rocky mtn. juniper	

*Planting mix will be planted on the wooded area. The willows will be planted within ¹⁰20 feet of drainages to assure sufficient moisture for establishment and growth.